

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 1:13CR339
	)	
Plaintiff,	)	JUDGE BENITA Y. PEARSON
	)	
v.	)	
	)	
JORDIE L. CALLAHAN and	)	<u>GOVERNMENT’S SUPPLEMENTAL</u>
JESSICA L. HUNT,	)	<u>SENTENCING MEMORANDUM</u>
	)	
Defendants.	)	

Now comes the United States of America, by and through its counsel, Steven M. Dettelbach, United States Attorney, and Chelsea S. Rice and Thomas E. Getz, Assistant United States Attorneys, and respectfully submits this supplemental sentencing memorandum pursuant to the Court’s July 17, 2014, Order. In this supplemental memorandum, the Government identifies specific cites to the trial transcript that (1) support the Government’s objections to the Presentence Investigation Reports and (2) in response to Defendant Hunt’s objections to the Presentence Investigation Report.

## MEMORANDUM

### **I. Transcript Citations for Government's Objections to Defendants Presentence Investigation Reports**

The Government submitted several objections to the recitation of the offense conduct in the Presentence Investigation Reports ("PSRs") for both Callahan and Hunt. Specifically, the Government requested that the following be added to the described offense conduct:

1. Hunt's son would "smack [B.E.] upside the head" while Hunt was present.  
Doc. 148, PageID 3007-08 (Trial Trans. Pg. 575-76).
2. Hunt's son shot S.E. with a BB gun when S.E. refused to comply with Hunt's demand that S.E. rub her face in her own feces.  
Doc. 150, PageID 3702-06 (Trial Trans. Pg. 1270-74).
3. Hunt's sons tied B.E. up with a rope; Hunt and Callahan did not let S.E. untie B.E.  
Doc. 150, PageID 3738-42 (Trial Trans. Pg. 1306-10).
4. Hunt's sons "hit [B.E.], kick [B.E.], throw B.E. across the bedroom floor."  
Doc. 150, PageID 3675 (Trial Trans. Pg. 1243).
5. Hunt's sons kicked S.E.  
Doc. 150, PageID 3676 (Trial Trans. Pg. 1244); Doc. 154, PageID 4811-13 (Trial Trans. Pg. 2379-81); Govt. Ex. 160.
6. Hunt's son likely inappropriately touched and/or molested B.E.  
Doc. 150, PageID 3754-56 (Trial Trans. Pg. 1322-24).
7. Hunt and Callahan forced S.E. to tie up B.E.  
Doc. 150, PageID 3742-43 (Trial Trans. Pg. 1310-11).
8. When S.E. "do something bad," Hunt's sons (and Hunt) watched while Callahan forced S.E. to wear a dog collar, go in a dog cage and eat dog food.  
Doc. 150, PageID 3639-40 (Trial Trans. Pg. 1207-08).

## **II. Transcript Citations in Opposition to Defendant Hunt's Objections**

### **1. Defense Objection to Page 7, Paragraph 24.**

Hunt has made several objections regarding Justin Young's testimony. The Government does not dispute that Young's testimony at trial did not consist of the full array of information he provided to law enforcement. The Government does not object to changing the attribution of the facts in this paragraph to witnesses who testified about them at trial. However, if the attribution to Young is removed with respect to these facts, the Government asks that the following testimony by Young be added to the offense conduct:

- Callahan told Young that he kicked S.E. in the hip so that she could go to the hospital and get prescription pills for Callahan, Hunt, and Young to use.  
Doc. 153, PageID 4669 (Trial Trans. Pg. 2237).

Additionally, while Young did not testify at trial to all the facts in this paragraph, there were other witnesses (in addition to S.E.) who testified to that information at trial and, therefore, those facts should not be removed from the offense conduct.

#### **a. Dezerah Silsby**

- Hunt told S.E. to punish B.E., and Hunt told S.E. that she (Hunt) would "show her how to punish her kid." Doc. 148, PageID 3004-05 (Trial Trans. Pg. 572-3).  
- Callahan told S.E. to punish B.E., "hit [B.E.] harder." Doc. 148, PageID 3006 (Trial Trans. Pg. 574).

#### **b. Daniel Brown**

- Hunt and Callahan ordered S.E. to go upstairs and stop B.E.'s crying or they were going to do it for S.E.; Callahan told S.E. to hit B.E. with a belt. Doc. 153, PageID 4487-88 (Trial Trans. Pg. 2055-56).  
- Hunt and Callahan hit, smacked, pushed, and assaulted S.E. Doc. 153, PageID 4470-72 (Trial Trans. Pg. 2038-40).  
- Hunt and Callahan physical assaulted S.E. because B.E. went to the bathroom upstairs. Doc. 153, PageID 4490 (Trial Trans. Pg. 2058).

#### **c. Rachel Pryor**

- Hunt and Callahan often threatened S.E. with having B.E. taken away from S.E. Doc. 153, PageID 4613-14 (Trial Trans. Pg. 2181-82).  
- Pryor heard Hunt ordered S.E. to discipline B.E. on several occasions. Doc. 153, PageID 4622-24 (Trial Trans. Pg. 2190-93).

With respect to the trial testimony of Curtis Stackhouse, his trial testimony included the following:

- “I observed [Hunt] grabbing S.E. by the hair and putting her face down in dog urine and feces” so that S.E. would “clean it up.” Doc. 152, Page ID 4363-64 (Trial Trans. Pg. 1931-32); Doc. 152, PageID 4393 (Trial Trans. Pg. 1961)
- Callahan told Stackhouse that it was S.E.’s job to “clean everything up.” Doc. 152, PageID 4364 (Trial Trans. Pg. 1932).

2. Defense Objection to Page 8, Paragraph 25.

With respect to the offense conduct regarding Hunt ordering S.E. to tie up B.E., the Government directs the Court to the trial transcript citations under heading I of this pleading, specifically numbers 3 and 7.

With respect to S.E.’s food being locked up, the Government reminds the Court of the following trial testimony on this issue:

a. Rachel Pryor

- S.E.’s food was locked on the basement steps and S.E. had to ask Hunt or Callahan for permission to get the key to open the locked door. Doc. 153, PageID 4622; 4652 (Trial Trans. Pg. 2190; 2220).

Respectfully submitted,

STEVEN M. DETTELBACH  
United States Attorney

By: /s/ Chelsea S. Rice  
Chelsea S. Rice (OH: 0076905)  
Thomas E. Getz (OH: 0039786)  
Assistant United States Attorneys  
United States Court House  
801 West Superior Avenue, Suite 400  
Cleveland, OH 44113  
(216) 622-3752/3840  
(216) 522-8355/7358 (facsimile)  
Chelsea.Rice@usdoj.gov  
Thomas.Getz@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of July 2014 a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Chelsea S. Rice

Chelsea S. Rice

Assistant U.S. Attorney